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June 22, 2012

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Via ECF and Regular Mail

Hon. Magistrate Judge Michael A. Hammer
Martin Luther King, Jr. Federal Building & U.S. Courthouse
U.S. District Court of New Jersey
50 Walnut Street, Courtroom 3C
Newark, New Jersey 07101

Re: *Castro et al. v. Sanofi Pasteur Inc.*, 2:11-cv-07178 (JLL) (MAH)
Marquez & Bengochea, M.D., P.A. v. Sanofi Pasteur Inc., 2:12-cv-00652 (JLL) (MAH)

Dear Judge Hammer:

Pursuant to Your Honor's June 11, 2012 Order (Dkt. 95 in 2:11-07178; Dkt. 9 in 2:12-00652), attached is the parties' Proposed Consent Order.

Thank you for Your Honor's consideration.

Respectfully submitted,

/s/ Ryan P. Blaney

Ryan P. Blaney

Attachment

cc: Counsel for Plaintiffs (via ECF)

“Consolidated Action”) both the *Castro* and *Sugartown* cases as well as “any ‘tag along’ class action cases which assert or purport to assert class action claims arising from or relating to the operative facts contained in the Complaints that are subsequently filed in or transferred to this Court.”

WHEREAS, the plaintiffs in *Castro* and *Sugartown* filed a First Consolidated Amended Class Action Complaint, on January 20, 2012 (Dkt. 28 in Civ. No. 2:11-cv-07178).

WHEREAS, the Court has previously approved the parties’ stipulation extending the deadline for Sanofi to answer or otherwise respond to the *Marquez* complaint to fourteen days after the date upon which the Court electronically files its decision on Sanofi’s Motion to Dismiss the Amended Class Action Complaint (Dkt. 72 in Civ. No. 2:11-cv-07178).

WHEREAS, on June 11, 2012, the Court ordered defendant Sanofi Pasteur to file a consent order consolidating this Civ. No. 12-00652 with, and into, Civ. No. 11-07178. (See Dkt. 95 in Civ. No. 2:11-07178; Dkt. 9 in Civ. No. 2:12-00652).

IT IS HEREBY ORDERED that *Marquez & Bengochea, M.D., P.A. v. Sanofi Pasteur Inc.*, Civ. No. 2:12-cv-00652 is consolidated with and into the Consolidated Action. All future filings applicable to the Consolidated Action shall be made in Civ. No. 2:11-cv-07178. Unless the filing expressly states otherwise in the caption, all filings and orders made in the Consolidated Action (Civ. No. 2:11-07178) shall apply equally to Civ. Nos. 2:11-07178, 2:12-00136, and 2:12-00652.

IT IS FURTHER ORDERED that the caption for the Consolidated Action is:

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

	X	
	:	
ADRIANA M. CASTRO, M.D., P.A.;	:	Case No. 2:11-cv-07178 (JLL)(MAH)
SUGARTOWN PEDIATRICS, LLC; and	:	
MARQUEZ and BENGOCHEA, M.D.,	:	<u>ECF CASE</u>
P.A, on behalf of themselves and all	:	
others similarly situated,	:	
Plaintiffs/Counterclaim Defendants,	:	
	:	
v.	:	
	:	
SANOFI PASTEUR INC.,	:	
	:	
Defendant/Counterclaim Plaintiff.	:	
	X	

Dated: June __, 2012

The Honorable Michael A. Hammer
United States Magistrate Judge

The undersigned hereby consent to the form and entry of the within Consent Order:

<p><u>/s/ Ryan P. Blaney</u></p> <p>Ryan P. Blaney PROSKAUER ROSE LLP 1001 Pennsylvania Ave. NW Suite 400 South Washington, D.C. 20004 T: (202) 416-5844 F: (202) 416-6899 E: rblaney@proskauer.com</p> <p><i>Attorney for Defendant-Counterclaim Plaintiff Sanofi Pasteur Inc.</i></p> <p>DATE: June 22, 2012</p>	<p><u>/s/ Peter S. Pearlman</u></p> <p>Peter S. Pearlman COHN LIFLAND PEARLMAN HERRMANN & KNOPF, LLP Park 80 Plaza West-One 250 Pehle Ave., Suite 401 Saddle Brook, NJ 07663 T: 201-845-9600 F: 201-845-9423 E: psp@njlawfirm.com</p> <p><i>Attorney for Plaintiffs-Counterclaim Defendants</i></p> <p>DATE: June 22, 2012</p>
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CERTIFICATE OF SERVICE

I hereby certify that on June 22, 2012, I served via the Court's Electronic Filing System a copy of Consent Order.

Dated: June 22, 2012

By: /s/ Ryan P. Blaney

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